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PARALEGAL
Maria Nunez, B.S.

August 27, 2021

9/7/2021

Via ECF Only

Honorable Paul Crotty
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

The sentencing will be adjourned to October 21, 2021 at 11:15 am.
No objection
Paul Crotty
USDC

Re: United States of America v. Zhen, et. al.
Case No.: 20-CR-56(PAC)

Your Honor:

This office represents Edward Hernandez, a defendant in the above referenced matter who is scheduled for sentencing before the Court on September 14, 2021. I write on behalf of my client to respectfully request that the Court **adjourn sentencing in this matter for a period of 30 days to a date after October 14, 2021.** The final PSR was just received by the defense at the end of July and, given my existing schedule, I would like to use the requested time to review same with my client and his family and prepare a sentencing memorandum for the Court..

I have communicated this request to the Government and AUSA Flodr has no objection hereto.

Counsel further agrees and requests that time, if any, pursuant to the Speedy Trial Act, be excluded until the adjourned date set by the Court. The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

John Russo

John L. Russo(JR6200)

Cc: AUSA Aline Flodr (via ECF)